

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**PLANNED PARENTHOOD CINCINNATI  
REGION, et al.,**

**Plaintiffs,**

**BOB TAFT, *et al.*,**

## Defendants.

**CASE NO: C-1-04-493**

**DECLARATION OF  
HELENE T. KRASNOFF IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR ATTORNEYS'  
FEES AND COSTS**

**HELENE T. KRASNOFF** declares and states the following:

1. I am a staff attorney at Planned Parenthood Federation of America ("PPFA"), and I was responsible for preparing this fee petition. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Costs.
2. Attached to my declaration is a table summarizing the time I devoted to the preparation of this fee petition. This summary shows the date the legal services were performed, the type of work done, and the amount of time expended. This chart was compiled from contemporaneously maintained time records and reflects the exercise of appropriate billing judgment.
3. I have been in my current position at PPFA since March 2000. In this position, I have devoted approximately half of my time to conducting litigation challenging state and federal laws that restrict access to abortion services, such as the one at issue in this case. The remainder of my time is spent advising PPFA and its affiliates on the legal implications of state and federal legislation relating to the provision of reproductive health care. My responsibilities are national in scope.

4. In 1992, I received a Bachelor of Arts degree from Duke University. I then spent two years working for the U.S. House of Representatives, where my work focused exclusively on health care related legislation. In 1997, I graduated with honors from the University of Michigan Law School.

5. After law school, I became associated with the law firm of Arnold & Porter in Washington, DC. In private practice, I litigated cases in federal courts, state courts, administrative tribunals as well as in arbitration. In addition to my commercial work, I was part of a team that petitioned the Department of Justice on a pro bono basis and successfully obtained the first posthumous Presidential pardon in the history of the United States for Lieutenant Henry Ossian Flipper. I was responsible for the legal brief to the Justice Department, which was subsequently published in the Indiana Law Journal. See "Bending Toward Justice: The Posthumous Pardon of Lieutenant Henry Ossian Flipper," Indiana Law Journal, Volume 74, Number 4 (coauthored with Darryl Jackson, Jeffrey Smith, and Edward Sisson).

6. In my time at PPFA, I have gained substantial experience litigating reproductive rights challenges. See, e.g., Planned Parenthood v. Gonzales, 435 F.3d 1163 (9th Cir. 2006), cert. granted, 129 S. Ct. 2901 (June 19, 2006) (No. 05-1382); Planned Parenthood of Idaho, Inc. v. Wasden, 376 F.3d 908 (9th Cir. 2004); Planned Parenthood of Cent. Tex. v. Sanchez, 280 F. Supp. 2d 590 (W.D. Tex. 2003), remanded by, Planned Parenthood of Houston and Southeast Tex. v. Sanchez, 403 F.3d 324 (5th Cir. 2005); Planned Parenthood v. Janklow, 216 F. Supp. 2d 983 (D.S.D. 2002), remanded by, Planned Parenthood v. Rounds, 372 F.3d 969 (8th Cir. 2004). As part of my work on these cases, I have on occasion been involved in petitioning for attorneys' fees and drafting the necessary briefs and supporting documents.

7. As shown in the attached time records, I spent a total of 23 hours working on this fee petition. I believe this is a reasonable amount of time to prepare a fee petition for a complex case that involved multiple attorneys. Moreover, the time I spent on the fee petition was reduced because I had the assistance of a third-year law student intern, for whose time Plaintiffs do not seek compensation.

8. I respectfully submit that, in light of my experience, skills, and ability, the hourly rate of \$290 per hour for the time I worked on this fee petition is fair and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 29, 2006

  
HELENE T. KRASNOFF

<b>Planned Parenthood South West Ohio v. Taft</b>		
<b>Timesheet for Helene Krasnoff</b>		
<b>Date</b>	<b>Work description</b>	<b>Hours</b>
10.13.06	T/c with R. Evans and J. Straus re: rates	0.25
	Conf. with J. Straus re: brief	0.25
11.14.06	Review Julie's draft of brief; review and revise draft declarations	3.00
11.15.06	Review case law; draft and revise brief; meet with J. Straus re: brief	5.00
11.16.06	Read case law; draft and revise fee brief	3.00
11.17.06	Review additional case law; compile attorney hours; edit brief	1.00
11.21.06	Revise and review fee brief	1.50
11.27.06	Revise and review fee brief; review hours and costs; draft declarations	3.50
	T/c with J. Hill re: fee brief; edit Hill documents	0.75
	T/c's with R. Evans re: status of fee papers	0.75
11.28.06	T/c with N. Berner re: brief	0.50
	Revise brief per N. Berner's suggestions	0.75
	T/c with D. Buckley re: declaration	0.25
11.29.06	Finalize fee papers	2.50
	<b>Total</b>	<b>23.00</b>